

Privacy, Data Protection and Security policy

1. Introduction

This privacy policy sets out how The Andrea Adams Consultancy, registered in England, No7578745 use and protects any information that you provide when using our website or engaging in our services. The Andrea Adams Consultancy is committed to protecting your privacy and we comply with the data protection laws applicable to the UK. This policy has been updated to reflect the 28th May 2018 GDPR legislation.

2. Our Approach to Privacy

The Andrea Adams Consultancy places a high priority on safeguarding confidential information and processing personal data in an ethical manner, and we take our responsibility for the security of customer very seriously. To help us continue to achieve this, we have embedded privacy into all of our systems and processes. This means that privacy and data protection is taken into consideration in all of our business practices so that our clients, employees and suppliers' right to data privacy and data protection is our default position when processing data.

This ensures that no additional actions are required by you to ensure your privacy is honoured and protected. It also means we will not share your data with third parties for marketing purposes unless you have asked that we do or to meet a legal requirement.

In order to carry out other business functions and to deliver our services, we rely on the following lawful conditions for processing personal data:

- **Consent** – the individual has given their Consent to the processing of their Personal Data.
- **Contractual** – processing of Personal Data is necessary for the performance of a contract to which the individual is a party or for The Andrea Adams Consultancy to take pre-contractual steps at the request of the individual.
- **Legal Obligation** – processing of Personal Data is necessary for compliance with a legal obligation to which The Andrea Adams Consultancy is subject.
- **Legitimate Interests** – processing is necessary under the Legitimate Interests of The Andrea Adams Consultancy or an associated third party, unless these interests are overridden by the individual's interests or fundamental rights.

We will be clear and transparent with you about which lawful basis is used when processing your personal data.

3. Data Handline: Collecting Personal Data

In order to deliver our services and to carry out necessary business functions, we may collect certain personal data from you in a variety of ways, such as, through our website, via email, an online portal, or verbally. These details may include (where applicable), names, contact information and basic employment details.

Depending on the service we are delivering to you or your company, we may also ask for more detailed information about your employment such as the department or team you work in, your

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length of employment and professional performance goals.

Personal data we obtain is collected in a few key ways:

- Data disclosed by the individual
- Data disclosed by an authorised third party (i.e. employer) on the individual's behalf
- Data obtained from linked system or database
- Data generated through user interaction with systems/services

Where your data is provided to us by an authorised third party such as your employer (i.e. in the form of course delegate lists), it is the third party's responsibility to ensure they have the correct lawful basis in place to share this data with The Andrea Adams Consultancy.

Personal data contained within documentation relating to investigations, appraisals, grievances or disciplinaries may be collected and shared to authorised parties with the consent of the parties

4. Data Handling: The Purpose of Processing Personal Data

Your data may be used for a number of purposes including, but not limited to:

to provide all the elements of the learning & development and investigation services we have been contracted to provide by yourself or your employer's, to assess the quality of our services, administrative activities, crime prevention/detection (i.e. fraud), legal obligations of the business, statistical and marketing analysis, customer surveys, customer relations communications and offering you services and products we believe may interest you.

You will always be told what we intend to do with any personal data we collect from you, however the principal reasons are to:

- support the delivery of contracted services and products, or
- achieve our marketing and sales strategies.

More specifically, these may take the form of the below likely scenarios:

5. Data Handling Individuals engaged with the Andrea Adams Consultancy as part of contract or pre-contract actions.

When taking part in a service (e.g. diagnostic, survey, workshop, investigation) as part of a programme or service we are contracted to deliver, the information you provide will only be used for the stated purposes and/or those you consented to. This may include product research & development, administrative and legal purposes, statistical analysis, systems testing, or service

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maintenance and development. In this scenario, we would be relying on contractual necessity as the primary legal basis for processing personal data.

The personal data you provide here will either be anonymised or deleted after 2 years.

6. User interactions with online services and resources such as our website, blog subscription, or downloading documents.

We may collect information to better understand how visitors use our website and interact with our marketing content so we can offer timely and relevant information. When using our website to register to sign up to our blog subscription or submit an enquiry, your data may be used for the following:

- For our own internal records.
- To improve the products and services we provide.
- To contact you in response to a specific enquiry.
- To customise our website for user needs and preferences.
- To send you promotional emails about products, services, offers and other things we think might be relevant to you.
- To send you promotional mailings or to call you about products, services, offers and other things we think might be relevant to you.
- To contact you via email, telephone or mail for market research reasons.

In this scenario, we would be relying on legitimate interests and where required, consent, as the primary legal bases for processing personal data. The Andrea Adams Consultancy will only keep data for as long as is necessary to meet these purposes. We will never share, sell, or rent individual personal information to an external party without your advance permission, or unless ordered by a court of law. The personal data you provide to us is only available to relevant employees and contracted service providers. If required by law, The Andrea Adams Consultancy may disclose data to government and/or enforcement agencies.

If we intend to use your data for a new purpose outside of those detailed in this Policy, this policy will be updated to keep you informed of the same; should consent be required from affected individuals, then it will be sought. The Andrea Adams Consultancy will never supply your data to third parties for marketing purposes.

7. Data Handling-Keeping personal data secure

Our website is protected by firewalls and we have implemented security policies, rules and technical measures to protect the data in our control. These security measures are designed to prevent unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss.

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For the purposes of the Data Protection legislation, we, the Data Controller, would be responsible for keeping such personal data secure.

Any information you provide us with when using our services is stored using secured systems and processes. Direct access to these databases is restricted to authorised personnel and their appointed agents only. We have taken every reasonable step to ensure that your personal data is held securely at all times, and that access to these are closely monitored. We use security measures to protect against the loss, misuse and alteration of data within our systems.

We also use a two factor authentication process which sends a digital passcode to a separate device from a mobile via an encryption messaging application. This is in order to access a document via passcode entry. Files are stored in password protected folders with only authorised access permitted. For highly sensitive and confidential documentation the same two factor authentication is used to send to customers and clients to ensure the upmost security.

Please be aware however, that no internet or email transmission is ever fully secure or error free. You should take special care in deciding what personal data you send to us via email and keep this in mind when disclosing any personal data to us via the internet.

8. Data Handling - Controlling your personal data

Any personal data we collect from you or we generate as a result of your interaction with our systems and services belongs to you. Under the data protection laws in the UK you therefore have the right to know if your data is being processed, why and for how long. This will include details of what categories of data we process (e.g. storing your name and contact details in a CRM system), whether your data has been disclosed to third parties and their identities, and how to raise a complaint with the Information Commissioner's Office (ICO).

In addition to your right of access to data we process, The Andrea Adams Consultancy will uphold other rights afforded to you under the applicable data protection laws in the UK, namely:

- the right to request that errors in your personal data processed by (or on behalf of) The Andrea Adams Consultancy is amended or corrected;
- the right to erasure of your personal data if those data are no longer needed for their original purpose, or where the processing is based on consent and you withdraw that consent (and no other lawful basis for the processing exists);
- the right to restrict processing where the relevant personal data either cannot be deleted (e.g. because the data are required for the purposes of exercising or defending legal claims) or where you do not wish to have the data deleted;
- the right to request a copy of the personal data you have provided to us for yourself, or for it to be transferred to another organisation, if the processing was based on consent, the provision of business services under a contract, or processing carried out by automated means.

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If you believe that any information we are holding about you is incorrect or incomplete or wish to exercise any of your rights in relation to your personal data, please email alison@andreaadamsconsultancy.co.uk. We aim to respond promptly to any requests. However, please note that depending on the complexity and scope of your request, it may take up to 30 days for us to provide you with an adequate response.

9. Data Handling - Data breach

We have in place a procedure if a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed in connection with the provision of a public electronic communications service occurs. We will assess the scope and impact of the breach.

Based on the assessment of the likely risks to individuals, we will notify the individuals and/or their connected organisations that a data breach has occurred where this may result in a significant risk to the rights and freedoms of individuals, or where we may be in breach of a contractual obligation.

Any such notification to individuals will be carried out as soon as reasonably possible and will include information on the nature of the breach, the name and contact details of our Data Protection Officer, the likely consequences of the breach, measures taken or proposed by The Andrea Adams Consultancy to address it, and recommendations for affected individuals to mitigate any potential adverse effects. Such individuals will also be provided advice on how to make a complaint to the ICO.

If, due to the nature of the breach that The Andrea Adams Consultancy is required to inform the ICO, we will do so within 72 hours of becoming aware of the essential facts of the breach. Such notification must include at least: your name and contact details; the date and time of the breach (or an estimate); the date and time we detected it; basic information about the type of breach; and basic information about the personal data concerned.

10. Data Handling - Who has access to your personal data?

The data we collect about you is generally accessed only by authorised The Andrea Adams Consultancy employees for legitimate business purposes and providing services as part of a contract. However, if we work with partners or contractors, they may have limited access to your personal data but only so much to do their job.

If for example the delegate attends an Andrea Adams Consultancy course, we would not share his or her profile with a group of their peers. During a course, an individual may be invited by the Andrea Adams Consultancy accredited facilitator leading the session to share some information from their profile with the group, however this is their personal choice and done at their own discretion.

The following outlines who has access to your personal data, and under what circumstances:

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- The Andrea Adams Consultancy employee consultants and other staff who are involved in arranging and delivering the services you request (where privacy is legally covered under their contract of employment);
- An Associate/Approved Practitioner who is contracted by The Andrea Adams Consultancy to provide services to you on our behalf, and therefore bound under terms within their contract relating to confidentiality and privacy that is to the same standard and level as The Andrea Adams Consultancy employees.

The Director and Operations Manager are responsible for ensuring that all employees, associates, or other parties working on behalf of The Andrea Adams Consultancy comply with this Policy and, where applicable, must implement such practices, processes and controls, and training to ensure compliance. Where possible and appropriate, such measures and ,in particular ,training, should be made available to remote and home workers.

11. Data Handling - Use of Personal Data

Personal data will be handled with care at all times and will not be left unattended or on view to unauthorised persons at any time. This includes at home, remote working, on site and on public transport. If the computer is to be left unattended or any period of time, the computer screen will be locked before leaving it.

All Associates or other parties working on behalf of Andrea Adams Consultancy working from home will ensure that a specific room or part of their home (ideally behind a lockable door, in a room with lockable windows) for home working, particularly when handling personal and sensitive data. Every reasonable practicable effort will be made to ensure the best security possible in the circumstances.

12. Data Handling - How long we hold data

Client's, employee's, associate's and supplier's personal data will be held for as long as the individual or their employer is in receipt of services from; are employed; or engaged by the Andrea Adams Consultancy, plus up to a maximum of 6 years. Where a client makes a specific request for their data to be deleted sooner and it does not conflict with any legal or compliance requirement to hold data for longer, we will honour the request.

Employee personal data will be held for the duration of employment and then for 6 years after the last day of contractual employment. Employee contracts will be held for 6 years after last day of contractual employment.

Where data is held by third parties in support of the services we provide to you, the third parties are contractually bound to either delete data upon our request, delete data at the end of our supplier contract with them, or to anonymise data after 2 years of receipt.

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13. Data Security- Transferring Personal Data and Communications

We will ensure all employees and associates working on behalf of The Andrea Adams Consultancy working from home should wherever possible access and process personal data when connected to the AAC Virtual Private Network using The Andrea Adams Consultancy email addresses provided.

All emails that contain personal data will be marked confidential and where highly sensitive documentation is attached, a designated number will be associated with the data and will be password protected.

Any personal data may only be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances.

All Associates will ensure that their home network is secure at all times and that, where applicable and reasonably possible all security and software/firmware updates are installed and updated (see Cyber Security Policy)

Storage of Personal data on mobile devices (including, not limited to) laptops, tablets and smartphones), should be limited to the extent absolutely necessary for the performance of the relevant work.

14. Cookies

Cookies are used to identify you when you visit a particular site, analyse web traffic, and can help us facilitate a more personal web experience. The Andrea Adams Consultancy uses cookies to identify the pages that are being used and help us tailor our website to our customer's needs, thus allowing our website to respond to you as an individual.

Cookies do not provide us with access to your computer or any information about you, other than that which you choose to share with us. Cookies can also be controlled by the functions within your browser, so do consider changing as you see fit.

14. Changes to privacy policy

Any changes or updates to our privacy policy will be posted on The Andrea Adams Consultancy website and will be effective immediately from that point. Please ensure you regularly review the information posted on our website to be kept informed of any changes. Continued use and access to our website will constitute your acceptance of any changes to this policy.

If we make substantive changes to this Policy, we will announce it on our website to ensure that you are aware of the information we collect and how we use it at all times.

15. Organisational Measures

Finally, The Andrea Adams Consultancy will ensure that the following measures are followed when dealing with the collection, holding and processing, all Associates will be :

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- made aware of their individual responsibilities and our responsibilities under the Data Protection Law and will be provided with a copy of this policy (and the Cyber security policy)
- appropriately trained on the handling of personal data
- required and encouraged to exercise caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise
- responsible for all documents, files etc in their possession and that all reasonable precautions are taken to maintain the confidentiality of material in accordance with the business requirements

All methods that The Andrea Adams Consultancy use will be regularly evaluated and reviewed

Contacting us

If you have any questions regarding this policy, please get in touch via the details below.

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Company Director

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